

<p>United States Bankruptcy Court District Of New Jersey Caption In Compliance With D.N.J. LBR 9004-1</p> <p>DUANE MORRIS LLP A Delaware Limited Liability Partnership Sommer L. Ross, Esq. 1940 Route 70 East, Suite 100 Cherry Hill, NJ 08003-2171 Telephone: (302) 657-4951 Email: SLRoss@duanemorris.com</p> <p>and</p> <p>Lawrence J. Kotler, Esq. (Admitted <i>Pro Hac Vice</i>) 30 South 17th Street Philadelphia, PA 19103-4196 Telephone: (215) 979-1514 Email: LJKotler@duanemorris.com</p> <p><i>Counsel for WFCM 2016-C34 Medical Office Buildings NJ NY FL, LLC</i></p>	
<p>In Re:</p> <p>Hajjar Business Holdings, LLC, <i>et al.</i>,¹</p> <p>Debtors.</p>	<p>CHAPTER 11</p> <p>CASE NO. 20-12465-JKS (Jointly Administered)</p>

¹ The debtors in these cases are: HMOB of Jersey City Owner, LLC, Case No. 20-12557-JKS; Hajjar Medical Office Building of Jersey City, LLC, Case No. 20-12472-JKS; HMOB of Wayne Owner, LLC, Case No. 20-12550-JKS; Hajjar Medical Office Building of Wayne, LLC, Case No. 20-12464-JKS; HMOB of Roseland Owner, LLC, Case No. 20-12552-JKS; Hajjar Medical Office Building of Roseland, LLC, Case No. 20-12466-JKS; HMOB of New Brunswick Owner, LLC, Case No. 20-12549-JKS; Hajjar Medical Office Building of New Brunswick, LLC, Case No. 20-12476-JKS; HMOB of Oradell Owner, LLC, Case No. 20-12551-JKS; Hajjar Medical Office Building, LLC, Case No. 20-12470-JKS; HMOB of Carlstadt Owner, LLC, Case No. 20-12553-JKS; Hajjar Medical Office Building of Carlstadt, LLC, Case No. 20-12467-JKS; HMOB of Hackensack Office Owner, LLC, Case No. 20-12555-JKS; Hajjar Medical Office Building of Hackensack, LLC, Case No. 20-12471-JKS; HMOB of Hackensack Warehouse Owner, LLC, Case No. 20-12556-JKS; Hajjar Warehouse of Hackensack, LLC, Case No. 20-12473-JKS; HMOB of Fair Lawn Owner, LLC, Case No. 20-12547-JKS; Hajjar Medical Office Building of Fairlawn, LLC, Case No. 20-12468-JKS; HMOB of Glen Rock Owner, LLC, Case No. 20-12545-JKS; Hajjar Medical Office Building of Glen Rock, LLC, Case No. 20-12469-JKS; HMOB of Fair Lawn 15-01 Broadway Owner, LLC, Case No. 20-12536-JKS; Hajjar Business Holdings, LLC, Case No. 20-12465-JKS; HMOB of Mt. Kisco Owner, LLC, Case No. 20-12540-JKS; Hajjar Medical Office Building of Mount Kisco, LLC, Case No. 20-12474-JKS; HMOB of Miramar Owner, LLC, Case No. 20-12543-JKS; and Hajjar Medical Office Building of Miramar, LLC, Case No. 20-12475-JKS.

**NOTICE OF SECURED CREDITOR'S VERIFIED MOTION
TO QUASH BANKRUPTCY RULE 2004 SUBPOENA
ISSUED BY THE OWNER DEBTORS TO LNR PARTNERS, LLC**

PLEASE TAKE NOTICE that on **January 31, 2023**, at **10:00 a.m.**, or as soon thereafter as counsel may be heard, WFCM 2016-C34 Medical Office Buildings NJ NY FL, LLC, a Delaware limited liability company ("Secured Creditor"), as assignee of Wilmington Trust, N.A., as Trustee for the Registered Holders of Wells Fargo Commercial Mortgage Trust 2016 C-34 Commercial Mortgage Pass-Through Certificates Series 2016 C-34 ("Prior Secured Creditor"),² shall move before the Honorable John K. Sherwood, USBJ, at the United States Bankruptcy Court, 50 Walnut Street, Courtroom #3B, Newark, New Jersey 07102, to quash the subpoena issued under Rule 2004 of the Federal Rules of Bankruptcy Procedure by certain of the above-captioned debtors and debtors-in-possession to LNR Partners, LLC.

PLEASE TAKE FURTHER NOTICE that Secured Creditor will rely upon the supporting Motion submitted simultaneously herewith (the "Motion").

PLEASE TAKE FURTHER NOTICE that, in accordance with D.N.J. LBR 9013-2(a), opposition to the relief requested, and/or cross-motions, if any, shall be filed and served not later than seven days before the hearing date.

PLEASE TAKE FURTHER NOTICE that, pursuant to D.N.J. LBR 9013-3(a), in the event the Motion is contested, the parties must confer before the hearing to determine whether the issue can be resolved.

² On January 26, 2022, Secured Creditor filed its *Notice of Assignment of Loan Documents and Transfer of Claims* [Docket No. 903] (the "Transfer Notice") notifying the Court and all interested parties that Prior Secured Creditor had transferred to Secured Creditor: (i) all of Prior Secured Creditor's rights, interests and claims in, under, arising from, and otherwise related to, the Loan Documents (as defined in the proofs of claim filed by Prior Secured Creditor in these chapter 11 cases (the "POC")); and (ii) all of Prior Secured Creditor's claims filed against the Owner Debtors (as defined in the POC) in these chapter 11 cases.

PLEASE TAKE FURTHER NOTICE that, in accordance with D.N.J. LBR 9013-3(e), unless the Court authorizes otherwise prior to the hearing date hereof, no party may present oral testimony at the hearing on the Motion.

PLEASE TAKE FURTHER NOTICE that, in accordance with D.N.J. LBR 9013-1(a)(3), no separate brief is being filed in support of the Motion inasmuch as the relevant authorities and citations of law are cited in the Motion.

Dated: January 4, 2023

Respectfully submitted,

/s/ Sommer L. Ross

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